

**From:** Bertram, Gary  
**To:** HertzWu, Sara  
**Subject:** RE: Republic  
**Date:** Monday, March 25, 2013 12:53:11 PM

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Sara – I spoke with George Hess regarding the 112(r) question. He said they wouldn't be subject unless they were storing methane. I explained the landfill was flaring the landfill gas and he said they would not be subject.

Take Care,

Gary Bertram  
U.S. EPA - Region 7  
11201 Renner Blvd  
Lenexa, KS 66219

913-551-7533

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**From:** Bertram, Gary  
**Sent:** Friday, March 22, 2013 11:25 AM  
**To:** HertzWu, Sara  
**Subject:** RE: Republic

Sara – All good questions.

- MDNR should have everything that St. Louis County has. But, I'll find out if that is the case.
- I don't know if they are subject to 112(r). But, I'll drop a note to George Hess and see if he has anything on them.
- We should have a copy if the test was fairly recent. Otherwise, I'll have to see if MDNR or St. Louis County kept a copy.

Take Care,

Gary Bertram  
U.S. EPA - Region 7  
11201 Renner Blvd  
Lenexa, KS 66219

913-551-7533

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**From:** HertzWu, Sara  
**Sent:** Friday, March 22, 2013 11:09 AM  
**To:** Bertram, Gary  
**Subject:** RE: Republic

I should have waited on all my questions—sorry for the multiple emails.



Will St. Louis County have records that MDNR doesn't have? If so, we should include contacting them on our "to do" list before the 114 goes out.

Is the facility subject to 112(r) for risk management plans? If so, we should pull their RMP and see if CRIB has done any inspections. I'm not convinced they are, but I saw it in the permit.

The permit also references a stack test for their flare on p. 25, Item 5. Is there a copy of that publicly available that we can pull and review?

Thanks Gary.

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**From:** Bertram, Gary  
**Sent:** Friday, March 22, 2013 10:03 AM  
**To:** HertzWu, Sara  
**Subject:** RE: Republic

Sara – I may have found what we are looking for. Here's a link to the MDNR issued operating permit. It does cite WWW. <http://www.dnr.mo.gov/env/apcp/permits/bridgetonlandf2010opf.pdf>

Please let me know if there is more you need from me. I'll be on the clock until a little after 3:00 today.

Take Care,

Gary Bertram  
U.S. EPA - Region 7  
11201 Renner Blvd  
Lenexa, KS 66219

913-551-7533

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**From:** HertzWu, Sara  
**Sent:** Friday, March 22, 2013 8:12 AM  
**To:** Bertram, Gary  
**Subject:** Republic

Gary: Just to be clear, we are sure that Republic commenced construction, reconstruction or modification on or after May 30, 1991 so they are subject to Subpart WWW. I would imagine they did modify it after 1991 b/c the accepted waste until 2004, but I just want to make sure.

Does the state consider Subpart WWW to be applicable to Republic?

Thanks!

Sara Hertz Wu  
Assistant Regional Counsel  
EPA Region VII

11201 Renner Boulevard  
Lenexa, Kansas 66219  
Phone: (913)551-7316  
Email: [hertzwu.sara@epa.gov](mailto:hertzwu.sara@epa.gov)  
Fax: (913) 551-7925